

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

AUG 18 1997

In the Matter of)	
)	
Access Reform)	CC Docket No. 96-262
)	
Price Cap Performance Review for)	CC Docket No. 94-1
Local Exchange Carriers)	
)	
Transport Rate Structure and Pricing)	CC Docket No. 91-213
)	
End User Common Line Charges)	CC Docket No. 95-72

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**COMMENTS OF AMERITECH ON
PETITIONS FOR RECONSIDERATION**

A. Introduction and Summary.

Ameritech respectfully submits its comments to the Petitions for Reconsideration and/or Clarification ("PFR") filed in this proceeding. Ameritech generally supports the PFR filed by USTA and the comments being filed by it, and also supports Sprint's proposal that portions of the Transport Interconnection Charge ("TIC") not be shifted to deaveraged transport rates. However, Ameritech opposes AT&T's proposal that a portion of switched and dedicated access charges attributable to trunk ports be allocated to rates for unbundled network element ("UNE") charged to competitive local exchange carriers ("CLECs").

B. Ameritech support USTA's PFR.

As a member of the United States Telephone Association ("USTA") Ameritech supports the PFR filed in the matter by USTA on July 11, 1997. In particular,

No. of Copies rec'd 029
List ABCDE

Ameritech believes that two of the issues raised by USTA are of vital importance and should be expeditiously resolved.

1. Marketing expenses should be recovered from all lines, not just business lines, since these expenses are legitimate costs that benefit all subscribers. Moreover, there is no credible proof that recovery of these costs from residential lines will have an adverse impact on universal service. In any event, the cap on the residential subscriber line charge ("SLC") still exists to further public policy interests in limiting the burden on residential end users. Reconsideration of this issue is critical to avoid an unreasonable implicit subsidy from business customers to residential customers. That is to say, since both residence and business customers benefit from these marketing costs, business customers should not be required to foot the entire bill. This implicit subsidy violates the fundamental principle that subsidies should be explicit and recovered in a competitively-neutral manner.¹ In today's competitive marketplace, such implicit subsidies induce competitive dislocations and cannot be sustained in the long run.
2. The Primary Interexchange Carrier Charge ("PICC") should be assessed on a trunk equivalency basis on Centrex lines. Resolution of this issue is of vital importance in order not to unduly burden interexchange carriers ("IXCs") that serve Centrex customers with excessive PICC charges versus those that are assessed to IXCs that serve private branch exchange ("PBX") customers. There is no cost basis for assessing PICC charges relative to Centrex customers that are 8 to 12 times higher than those assessed on comparable PBX systems. Since these excessive charges would be passed through by the IXCs to the end users, they would effectively deny to many end user customers reasonable access to Centrex service, even though it best meets their needs.

¹ See, 47 U.S.C. §254(d)(e); and First Report and Order released in this proceeding on May 16, 1997 at ¶11, ("Access Reform Order").

Other important issues raised by USTA in its PFR that deserve the Commission's prompt attention are:

1. Implementation of higher PICC on non-primary residential lines should be delayed until a year after the Commission issues a specific definition of the term "non-primary." This time is necessary for the local exchange carriers ("LECs") to implement system changes required to bill the charge. Ameritech opposes non-uniform PICC charges, but if they are required, LECs need time to develop and implement the necessary billing arrangements after they know to what lines the higher charges will apply.
2. The "X" productivity factor adjustments to access rates should not be allowed to reduce universal service fund contributions, since they are a subsidy and are thus not subject to productivity gains that underlie the X factor adjustments.
3. The Commission should clarify that the SLC applies when a business customer orders individual lines from multiple carriers.² In such a case, the customer is in fact obtaining multiple lines and should pay for those lines on the same basis as all other multi-line business customers. The Commission should close this loophole, so customers cannot evade paying their pro rata share of the SLC through the subterfuge of ordering service from several carriers.

² If there are to be different PICC charges for additional residential lines, the same approach should be followed.

C. Ameritech agrees with the comments of USTA.

Ameritech has also read the comments being filed by USTA and generally supports them. In the following sections, Ameritech will not repeat arguments made by USTA, but will rather supplement them and address additional items.

D. The PICC should be assessed on a uniform basis relative to both business and residence service.

The Commission's Access Reform Order requires that a new PICC be assessed relative to business and residence customers to recover common line revenues that are not recovered through the SLC and common line charges. However, the PICC is subject to ceilings of \$.53 for primary residence and single line business lines; \$1.50 for non-primary residence lines; and \$2.75 for multi-line business lines.³ Several commenters argue that assessing a higher PICC relative to multi-line business lines is just another form of improper implicit subsidy from business to residential users.⁴ Ameritech agrees there is no underlying cost basis justifying this differentiation, and that the PICC rate structure adopted by the Commission thus creates an implicit subsidy.

Implicit subsidies are contrary to the Commission's policy. As the Commission recognized, Congress specified that universal service support "should be explicit" and "[e]very telecommunications carrier that provides interstate telecommunications services shall contribute on an equitable and non-discriminatory basis. . . ."⁵ As a result, the Commission charged the states with the responsibility for "identifying

³ Access Reform Order at ¶94.

⁴ Comptel, 2-6; Call-America 2-8; County of Los Angeles 2-8.

⁵ 47 U.S.C. §254(d)(e). See, Access Reform Order at ¶4.

intrastate implicit universal service support. . .”⁶ By the same token, this Commission should not create implicit subsidies in its own rules.

Moreover, since the PICC charge is only assessed by incumbent LECs (“ILECs”), rather than by all local competitors, it artificially inflates business rates of ILECs only, and is therefore not competitively-neutral. It will thus distort the operation of the competitive marketplace by creating a non-cost based price floor, and artificially making ILECs less competitive. The resulting competitive dislocations will in the long run inure to the detriment of both business and residence customers.

Several parties have requested that the Commission reduce the amount of the PICC relative to multi-line business lines and set the PICC at the same level as the residence PICC.⁷ Ameritech agrees that the PICC should be uniformly applied relative to both business and residence lines. However, in order to fully recover the underlying costs, it is essential that the uniform PICC be set at a level that recovers the entire revenue requirement, which is at a level somewhat higher than the current residence PICC and lower than the multi-line business PICC. As an alternative, the Commission could eliminate the transition period and implement the full charges on January 1, 1998.⁸

E. There will be no double recovery of port costs.

In the Access Reform Order,⁹ the Commission established a new trunk port charge to recover the non-traffic sensitive costs that are currently recovered through

⁶ *Supra* at ¶11.

⁷ ACTA 2; TRA 5-12; U.S. Long Distance 2-3.

⁸ County of Los Angeles 9.

⁹ Access Reform Order ¶¶125-135.

the usage-based Local Switching rates. Ameritech strongly supports the Commission's determination that non-traffic sensitive costs should be recovered through a flat rate charge, because that methodology better matches the rates paid by a customer to the costs caused by that customer.

AT&T attacks the Access Reform Order, suggesting that this rate structure causes a double recovery of ILEC trunk port costs, when trunk ports are used to originate and terminate access traffic to customers served by CLECs through unbundled network elements ("UNE").¹⁰ AT&T claims that ILECs' unbundled local switching ("ULS") rates also recover a portion of these trunk costs, and asks the Commission to proportionally reduce the access trunk port charge when it is used to carry traffic to or from a CLEC's customer served through a UNE.

AT&T is mistaken; there is no double recovery. AT&T's assertion that "virtually all price caps ILECs have a UNE local switching element that covers the full cost of the local switching functionality, including the 'trunk port'"¹¹ is not factually correct as applied to Ameritech. Contrary to AT&T's assumption, Ameritech has filed separate rate elements for unbundled trunk ports, unbundled line ports, and unbundled local switching in its intrastate UNE tariffs. Thus, a CLEC are only charged a flat trunk port charge as a part of UNE rates when the port is dedicated to that particular CLEC. In that case, the CLEC, not Ameritech, assesses the access charge to the IXC. In cases where Ameritech carries the access traffic over its network for IXCs using Ameritech's switched access services, CLEC

¹⁰ AT&T 12-13.

¹¹ *Id.*

trunk ports are not used to originate or terminate that traffic, and the corresponding costs of those ports are not recovered through the access charges assessed by Ameritech.

AT&T is also wrong, at least as to Ameritech, when it asserts that there is a need to apportion to UNE services a part of flat-rate trunk port charges paid by interexchange carriers. Ameritech only charges IXCs a flat-rate trunk port at the end office only, when they order direct-routed transport. In that case, the trunk port is dedicated to the IXC and is not used to serve any other customer, including CLECs. Thus, an IXC ordering a flat-rate trunk port only pays for the trunk port that has been dedicated to it.

F. The TIC should not be shifted to deaveraged transport rates.

In the Access Reform Order,¹² the Commission directed that LECs using zone density pricing of transport remove from the TIC an amount equal to the difference between higher density and lower density zone rates, and shift it to the direct-trunked transport and the tandem-switched transport subcategories. This reassignment would be required for LECs that have deaveraged their transport rates and is renewed any time the LEC increases the differential between high and low density zones.

Sprint asks the Commission to reconsider its decision because it requires LECs to recover costs applicable to low density areas in rates for high density areas.¹³ Sprint points out that "[t]his runs against the very purpose of density-based deaveraging, by in effect forcing the LEC to raise high-density rates above costs to

¹² ¶227.

¹³ Sprint 7-8.

recover costs attributable to low-density areas.”¹⁴ In support of its position, Sprint points out that:

Indeed, the predicate for requiring such costs to be removed from the TIC is the Commission’s belief (see, ¶¶225-226) that special access rates (on which switched transport rates are based) did not fully reflect the costs of switched transport in low density areas¹⁵ (emphasis supplied).

Ameritech agrees with Sprint that because the amounts being removed from the TIC reflect costs in low density areas, they should either remain in the TIC as a explicit subsidy to those areas, or be reassigned solely to transport rates in low density areas, as an exogenous adjustment. Arbitrarily shifting the TIC revenue requirement across-the-board to all deaveraged transport rates has four major flaws.

First, the Commission was misinformed when it found that direct trunked transport rates are receiving any subsidy from the TIC. Since direct trunked transport rates were initially based on special access rates and are now, for the most part, still set at the level of special access transport, the Commission’s assumption of a subsidy implies that corresponding special access rates are also supported by the TIC. However, the rates for facility-based dedicated transport were set under the Commission’s rules at compensatory levels, and there is no basis for any conclusion that they are subsidized by the TIC. Therefore, there is no justification to shift a portion of the TIC to transport rates in the first place.

Second, under price cap regulations, direct trunked transport and special access are in the same trunking basket and are also contained in the same Service Band Indices (“SBIs”). Thus, any change in SBIs resulting from shifting amounts

¹⁴ *id.*

¹⁵ *id.*

from the TIC to direct trunked transport would also affect special access rates. This is totally inappropriate. The TIC was created as a result of switched transport restructure, and should never affect special access.

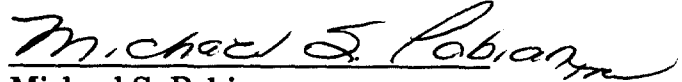
Third, when zone pricing was implemented, many LECs did so by decreasing rates in zones 1 and 2, rather than increasing rates in any zone. This often meant a voluntary reduction in revenues. The Commission's rules did not allow increases in the TIC rate, so no zone-related amounts were shifted to the TIC. To the extent, if any, that low density area costs still remain in the TIC, they can be re-allocated as amounts associated with ports, terminations, multiplexers and any other elements are re-allocated on January 1, 1998. No special treatment for zone density pricing is needed.

Fourth, maintaining an arbitrary fixed differential between rates in high density versus low density zones is contrary to the concepts of cost or market based rates under price caps. The Commission has already established a separate SBI for each zone, and price cap LECs are thereby prevented from manipulating pricing across zones. Rather, price changes are limited by the allocation of productivity and exogenous changes. Consistent with competitive pricing principles, the Commission should at least allow the LEC the ability to adjust rates based upon cost and market factors, within these very tight constraints. Failure to do so will create further economic dislocations that will stifle and distort efficient competition to the detriment of end users.

G. Conclusion.

For the above reasons, the Commission should reconsider and clarify its holdings in this proceeding as outlined herein.

Respectfully submitted,

A handwritten signature in cursive script, reading "Michael S. Pabian".

Michael S. Pabian

Larry A. Peck

Attorney for Ameritech

Room 4H86

2000 West Ameritech Center Drive

Hoffman Estates, IL. 60196-1025

847-248-6074

Dated: August 18, 1997

[LAP0116.doc]

CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Comments of Ameritech on Petitions for Reconsideration has been served on the parties on the attached service list, via first class mail, postage prepaid, on this 18th day of August, 1997.

By: Todd H. Bond
Todd H. Bond

WENDY S BLUEMLING
DIRECTOR REGULATORY AFFAIRS &
PUBLIC POLICY
THE SOUTHERN NEW ENGLAND
TELEPHONE COMPANY
227 CHURCH STREET
NEW HAVEN CT 06510

ROBERT M LYNCH
DURWARD D DUPRE
MARY W MARKS
THOMAS A PAJDA
ATTORNEYS FOR SOUTHWESTERN BELL
TELEPHONE COMPANY
ONE BELL CENTER ROOM 3520
ST LOUIS MO 63101

JAMES A BURG CHAIRMAN
PAM NELSON COMMISSIONER
SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION
STATE CAPITOL
PIERRE SD 57501-5070

REGINALD R BERNARD PRESIDENT
SDN USERS ASSOCIATION INC
P O BOX 4014
BRIDGEWATER NJ 08807

JEFFREY F BECK
JILLISA BRONFMAN
ATTORNEYS FOR EVANS TELEPHONE
COMPANY AT EL
BECK & AKERMAN
FOUR EMBARCADERO CNTR SUITE 760
SAN FRANCISCO CA 94111

GLENN B MANISHIN
CHRISTINE A MAILLOUX
ATTORNEYS FOR SPECTRANET
INTERNATIONAL INC
BLUMENFELD & COHEN
1615 M STREET NW SUITE 700
WASHINGTON DC 20036

TERESA MARRERO
SENIOR REGULATORY COUNSEL
TELEPORT COMMUNICATIONS GROUP
TWO TELEPORT DRIVE
STATEN ISLAND NY 10311

SUZI RAY MC CLELLAN PUBLIC COUNSEL
LAURIE PAPAS DEPUTY PUBLIC COUNSEL
TEXAS OFFICE OF PUBLIC UTILITY
COUNSEL
1701 N CONGRESS AVENUE 9-180
P O BOX 12397
AUSTIN TX 78711-2397

RANDALL B LOWE
ATTORNEY FOR
TELE-COMMUNICATIONS INC
PIPER & MARBURY L L P
1200 19TH STREET NW
WASHINGTON DC 20036

BRIAN CONBOY THOMAS JONES
GUNNAR HALLEY
ATTORNEYS FOR
TIME WARNER COMM HOLDING INC
THREE LAFAYETTE CENTRE
1155 21ST STREET NW
WASHINGTON DC 20036

DANA FRIX
TAMAR HAVERTY
COUNSEL FOR TELCO
COMMUNICATIONS GROUP INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

CHARLES C HUNTER
CATHERINE M HANNAN
ATTORNEYS FOR
TELECOMMUNICATIONS RESELLERS
ASSOCIATION
1620 I STREET NW SUITE 701
WASHINGTON DC 20006

MARGOT SMILEY HUMPHREY
ATTORNEY FOR
TDS TELECOMMUNICATIONS CORP
SUITE 1000
1150 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

F STEPHEN LAMB
MAS MANAGER
TCA INC TELECOMMUNICATIONS
CONSULTANTS
3617 BETTY DRIVE SUITE I
COLORADO SPRINGS CO 80917

PAT WOOD III CHAIRMAN
ROBERT W GEE COMMISSIONER
JUDY WALSH COMMISSIONER
PUBLIC UTILITIES COMMISSION OF
TEXAS
7800 SHOAL CREEK BLVD
AUSTIN TX 78757

CHRISTOPHER KLEIN CHIEF
UTILITY RATE DIVISION
TENNESSEE REGULATORY AUTHORITY
STAFF
460 JAMES ROBERTSON PARKWAY
NASHVILLE TN 37243-0505

ROBERT B MCKENNA
ATTORNEY FOR
U S WEST INC
1020 19TH STREET NW SUITE 700
WASHINGTON DC 20036

TIMOTHY R GRAHAM
ROBERT G BERGER
JOSEPH SANDRI
WINSTAR COMMUNICATIONS INC
1146 19TH STREET NW
WASHINGTON DC 20036

DANA FRIX
MARK SIEVERS
ATTORNEYS FOR
WINSTAR COMMUNICATIONS INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

BENJAMIN H DICKENS JR
GERRARD J DUFFY
ATTORNEYS FOR
THE WESTERN ALLIANCE
2120 L STREET NW SUITE 300
WASHINGTON DC 20037

RICHARD HEMSTAD COMMISSIONER
WILLIAM R GILLIS COMMISSIONER
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
1300 S EVERGREEN PARK DR SW
P O BOX 47250
OLYMPIA WA 98504-7250

LAWRENCE D CROCKER III
ACTING GENERAL COUNSEL
PUBLIC SERVICE COMMISSION OF THE
DISTRICT OF COLUMBIA
717 14TH STREET NW
WASHINGTON DC 20005

THOMAS K CROWE
MICHAEL B ADAMS JR
COUNSEL FOR
EXCEL TELECOMMUNICATIONS INC
2300 M STREET NW SUITE 800
WASHINGTON DC 20037

MR CLINT FREDERICK
FREDERICK & WARINNER LLC
10901 WEST 84TH TERRACE
SUITE 101
LENEXA KS 66214-1631

MICHAEL J SHORTLEY III
ATTORNEY FOR
FRONTIER CORPORATION
180 SOUTH CLINTON AVENUE
ROCHESTER NY 14646

KATHY L SHOBERT
DIRECTOR FEDERAL AFFAIRS
GENERAL COMMUNICATIONS INC
901 15TH STREET NW SUITE 900
WASHINGTON DC 20005

WARD W WUESTE
GAIL L POLIVY
ATTORNEYS FOR
GTE SERVICE CORPORATION
1850 M STREET NW SUITE 1200
WASHINGTON DC 20036

R MICHAEL SENKOWSKI
JEFFREY S LINDER
GREGORY J VOGT
ATTORNEYS FOR
GTE SERVICE CORPORATION
1776 K STREET NW
WASHINGTON DC 20006

MARTHA S HOGERTY
PUBLIC COUNSEL STATE OF MISSOURI
OFFICE OF THE PUBLIC COUNSEL
P O BOX 7800
JEFFERSON CITY MO 65102

EMILY C HEWITT G C
VINCENT L CRIVELLA ASSOC G C
MICHAEL J ETTNER SEN ASSOC G C
GENERAL SERVICES ADMINISTRATION
18TH & F STREETS NW ROOM 4002
WASHINGTON DC 20405

KENNETH T BURCHETT
VICE PRESIDENT
GVNW INC MANAGEMENT
7125 S W HAMPTON
PORTLAND OR 97223

MICHAEL T SKRIVAN
HARRIS SKRIVAN & ASSOCIATES INC
8801 SOUTH YALE SUITE 220
TULSA OK 74137

MYRA L KAREGIANES
GENERAL COUNSEL
CARMEN L FOSCO
SPECIAL ASSISTANTS
ATTORNEY GENERAL
ILLINOIS COMMERCE COMMISSION
160 N LA SALLE STREET SUITE C-800
CHICAGO IL 60601

DIANE SMITH
INDEPENDENT TELEPHONE &
TELECOMMUNICATIONS ALLIANCE
655 15TH STREET NW SUITE 220
WASHINGTON DC 20005-5701

GARY L MANN
DIRECTOR REGULATORY AFFAIRS
IXC LONG DISTANCE INC
98 SAN JACINTO SUITE 700
AUSTIN TX 78701

ALBERT H KRAMER
ATTORNEY FOR
ICG TELECOM GROUP INC
2101 L STREET NW
WASHINGTON DC 20037-1526

CINDY Z SCHONHAUT
SENIOR VICE PRESIDENT GOVT AFFAIRS
JULIA WAYS DORF
SENIOR DIRECTOR GOVT AFFAIRS
ICG TELECOM GROUP INC
9605 EAST MAROON CIRCLE
ENGLEWOOD CO 80112

DAVID A IRWIN
TARA S BECHT
ATTORNEYS FOR ITCs INC
1730 RHODE ISLAND AVE NW SUITE 200
WASHINGTON DC 20036-3101

BRIAN R MOIR
ATTORNEY FOR
INTERNATIONAL COMMUNICATIONS
ASSOCIATION
2000 L STREET NW
SUITE 512
WASHINGTON DC 20036-4907

EDWIN N LAVERGNE
J THOMAS NOLAN
ATTORNEYS FOR
THE INTERACTIVE SERVICES
ASSOCIATION
1250 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

STEPHEN G KRASKIN
SYLVIA LESSE
THOMAS J MOORMAN
ATTORNEYS FOR ILLUMINET
2120 L STREET NW SUITE 520
WASHINGTON DC 20037

RONALD DUNN
PRESIDENT
INFORMATION INDUSTRY ASSOCIATION
SUITE 700
1625 MASSACHUSETTS AVENUE NW
WASHINGTON DC 20036

MICHAEL S FOX
DIRECTOR REGULATORY AFFAIRS
JOHN STAURULAKIS INC
6315 SEABROOK ROAD
SEABROOK MD 20706

GREGORY M CASEY
DOUGLAS W KINKOPH
LCI INTERNATIONAL TELECOM INC
8180 GREENSBORO DRIVE
MC LEAN VA 22102

MITCHELL F BRECHER
COUNSEL FOR
LCI INTERNATIONAL TELECOM CORP
INC
1400 SIXTEENTH STREET NW
WASHINGTON DC 20036

RICHARD J JOHNSON
MICHAEL J BRADLEY
ATTORNEYS FOR THE MINNESOTA
INDEPENDENT COALITION
4800 NORWEST CENTER
90 SOUTH SEVENTH STREET
MINNEAPOLIS MN 55402-4129

JACK KRUMHOLTZ
LAW AND CORPORATE AFFAIRS DEPT
MICROSOFT CORPORATION
SUITE 600
5335 WISCONSIN AVE NW
WASHINGTON DC 20015

STANLEY M GORINSON
WILLIAM H DAVENPORT
ATTORNEYS FOR
MICROSOFT CORPORATION
1735 NEW YORK AVE NW
WASHINGTON DC 20006

JOSEPH S PAYKEL
ANDREW JAY SCHWARTZMAN
GIGI B SOHN
MEDIA ACCESS PROJECT
1707 L STREET NW SUITE 400
WASHINGTON DC 20036

DANIEL H WEITZNER
ALAN B DAVIDSON
CENTER FOR DEMOCRACY AND
TECHNOLOGY
1634 EYE STREET NW SUITE 1100
WASHINGTON DC 20006

PENNY BAKER
DEPUTY GENERAL COUNSEL
MISSOURI PUBLIC SERVICE COMMISSION
P O BOX 360
JEFFERSON CITY MO 65102

MAUREEN O HELMER
GENERAL COUNSEL
NEW YORK STATE DEPARTMENT OF
PUBLIC SERVICE
THREE EMPIRE STATE PLAZA
ALBANY NY 12223-1350

JOANNE SALVATORE BOCHIS
PERRY S GOLDSCHHEIN
ATTORNEYS FOR
THE NATIONAL EXCHANGE CARRIER
ASSOCIATION INC
100 SOUTH JEFFERSON ROAD
WHIPPANY NJ 07981

DANIEL L BRENNER
DAVID L NICOLL
COUNSEL FOR
THE NATIONAL CABLE TELEVISION
ASSOCIATION INC
1724 MASSACHUSETTS AVE NW
WASHINGTON DC 20036

CHARLES D GRAY GENERAL COUNSEL
JAMES BRADFORD RAMSAY
ASSISTANT GENERAL COUNSEL
NATIONAL ASSOCIATION OF
REGULATORY UTILITY COMMISSIONERS
1201 CONSTITUTION AVE SUITE 1102
WASHINGTON DC 20044

STEVEN G SANDERS PRESIDENT
NORTHERN ARKANSAS TELEPHONE
COMPANY INC
301 EAST MAIN STREET
FLIPPIN AR 72634

JAMES BRENNAN
ASSOCIATE DIRECTOR OF GOVERNMENT
SERVICES
NYSERNET INC
RENSSELAER TECHNOLOGY PARK
TROY NY 12180-7698

DAVID S J BROWN
E MOLLY LEAHY
NEWSPAPER ASSOCIATION OF AMERICA
529 14TH STREET NW SUITE 440
WASHINGTON DC 20045

ROBERT S TONGREN
DAVID C BERGMANN
OHIO CONSUMERS' COUNSEL
77 SOUTH HIGH STREET 15TH FLOOR
COLUMBUS OH 43266-0550

DR NORMAN MYERS
PRESIDENT
OZARKS TECHNICAL COMMUNITY
COLLEGE
P O BOX 5958
SPRINGFIELD MO 65801

BETTY D MONTGOMERY
ATTORNEY GENERAL
STEVEN T NOURSE
ASSIST ATTORNEY GENERAL
THE PUBLIC UTILITIES COMMISSION OF
OHIO
180 EAST BROAD STREET
COLUMBUS OH 43215-3793

MARK J GOLDEN
ROBERT L HOGGARTH
MARY MADIGAN
PERSONAL COMMUNICATIONS INDUSTRY
ASSOCIATION
500 MONTGOMERY STREET SUITE 700
ALEXANDRIA VA 22314-1561

JOE D EDGE
TINA M PIDGEON
ATTORNEYS FOR
PUERTO RICO TELEPHONE COMPANY
901 15TH STREET NW SUITE 900
WASHINGTON DC 20005

SCOTT J RUBIN ESQ
COUNSEL FOR
PENNSYLVANIA INTERNET SERVICE
PROVIDERS
3 LOST CREEK DRIVE
SELINGROVE PA 17870-9357

NANCY C WOOLF
ATTORNEY FOR
PACIFIC BELL AND
NEVADA BELL
140 NEW MONTGOMERY ST ROOM 1523
SAN FRANCISCO CA 94105

JONATHAN JACOB NADLER
ATTORNEY FOR
THE INFORMATION TECHNOLOGY
ASSOCIATION OF AMERICA AND
THE INTERNET ACCESS COALITION
1201 PENNSYLVANIA AVENUE NW
P O BOX 407
WASHINGTON DC 20044

MARGOT SMILEY HUMPHREY
ATTORNEY FOR
NRTA
1150 CONNECTICUT AVE NW SUITE 1000
WASHINGTON DC 20036

DAVID COSSON
L MARIE GUILLORY
ATTORNEYS FOR
NTCA
2626 PENNSYLVANIA AVE NW
WASHINGTON DC 20037

LISA M ZAINA
KENNETH JOHNSON
ATTORNEYS FOR
OPASTCO
21 DUPONT CIRCLE NW SUITE 700
WASHINGTON DC 20036

GEORGE PETRUTSAS
PAUL J FELDMAN
ATTORNEYS FOR
ROSEVILLE TELEPHONE COMPANY
11TH FLOOR 1300 NORTH 17TH STREET
ROSSLYN VA 22209

JOHN J LIST
SENIOR VICE PRESIDENT
RURAL TELEPHONE FINANCE
COOPERATIVE
2201 COOPERATIVE WAY
HERNDON VA 20171

JON RADOFF
1630 WORCESTER ROAD #421
FRAMINGHAM MA 01901

HENRY D LEVINE
LAURA F H MC DONALD
THE BANKERS CLEARING HOUSE
MASTERCARD INTERNATIONAL INC
AND VISA U S A INC
1300 CONNECTICUT AVE NW SUITE 500
WASHINGTON DC 20036

EDWARD SHAKIN
ATTORNEY FOR
BELL ATLANTIC TELEPHONE COMPANIES
1320 NORTH COURT HOUSE ROAD
EIGHTH FLOOR
ARLINGTON VA 22201

JOSEPH DI BELLA
ATTORNEY FOR
THE NYNEX TELEPHONE COMPANIES
1300 I STREET NW SUITE 400 WEST
WASHINGTON DC 20005

M ROBERT SUTHERLAND
RICHARD M SBARATTA
ATTORNEY FOR
BELLSOUTH CORPORATION
BELLSOUTH TELECOMMUNICATIONS INC
1155 PEACHTREE STREET NE SUITE 1700
ATLANTA GA 30309-3610

DAVID H SCHWARTZ
COUNSEL FOR
THE COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS
2300 M STREET NW SUITE 800
WASHINGTON DC 20037

RONALD L PLESSER
JULIE A GARCIA
MARK J O CONNOR
ATTORNEYS FOR
THE COMMERCIAL INTERNET EXCHANGE
ASSOCIATION
1200 19TH STREET NW SEVENTH FLOOR
WASHINGTON DC 20036

RICHARD M TETTELBAUM
ASSOC GENERAL COUNSEL
CITIZENS UTILITIES COMPANY
SUITE 500
1400 16TH STREET NW
WASHINGTON DC 20036

RACHEL J ROTHSTEIN
CABLE & WIRELESS INC
8219 LEESBURG PIKE
VIENNA VA 22182

DANNY E ADAMS
EDWARD A YORKGITIS JR
ATTORNEYS FOR CABLE & WIRELESS
1200 19TH STREET NW SUITE 500
WASHINGTON DC 20036-2423

KENT LARSEN
ASSISTANT DIRECTOR FED REGULATORY
CATHEY HUTTON & ASSOCIATES
2711 LBJ FREEWAY
SUITE 560
DALLAS TX 75234

PETER ARTH JR LIONEL B WILSON
MARY MACK ADU HELEN M MICKIEWICZ
ATTORNEYS FOR THE PEOPLE OF THE
STATE OF CALAFORNIA AND THE PUBLIC
UTILITIES COMMISSION OF THE STATE
OF CALIFORNIA
505 VAN NESS AVE
SAN FRANCISCO CA 94102

JAMES LOVE
DIRECTOR
CONSUMER PROJECT ON TECHNOLOGY
P O BOX 19367
WASHINGTON DC 20036

RONALD J BINZ PRESIDENT
DEBRA R BERLYN EXECUTIVE
DIRECTOR
JOHN WINDHAUSEN JR GEN COUNSEL
COMPETITION POLICY INSTITUTE
1156 15TH STREET NW SUITE 310
WASHINGTON DC 20005

CHRISTOPHER J WILSON
CHRISTINE M STRICK
ATTORNEY FOR
CINCINNATI BELL TELEPHONE COMPANY
2500 PNC CENTER
201 EAST FIFTH STREET
CINCINNATI OH 45202

THOMAS E TAYLOR
SR VICE PRESIDENT GENERAL COUNSEL
CINCINNATI BELL TELEPHONE CO
201 EAST FOURTH STREET 6TH FLOOR
CINCINNATI OH 45202

CHRISTOPHER W SAVAGE
ATTORNEY FOR
CENTENNIAL CELLULAR CORPORATION
1919 PENNSYLVANIA AVE NW SUITE 200
WASHINGTON DC 20006

RANDOLPH J MAY
BONDING YEE
ATTORNEYS FOR
COMPUSERVE INCORPORATED AND
PRODIGY SERVICES CORPORATION
1725 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004-2404

WAYNE LEIGHTON PHD
SENIOR ECONOMIST
CITIZENS FOR A SOUND ECONOMY
FOUNDATION
1250 H STREET NW SUITE 700
WASHINGTON DC 20005

ALAN J GARDNER
JERRY YANOWITZ
LESLA LEHTONEN
JEFFREY SINSHEIMER
CALIFORNIA CABLE TELEVISION
ASSOCIATION
4341 PIEDMONT AVENUE
OAKLAND CA 94611

WAYNE V BLACK
C DOUGLAS JARRETT
SUSAN M HAFELI
ATTORNEYS FOR
THE AMERICAN PETROLEUM INSTITUTE
1001 G STREET NW SUITE 500 WEST
WASHINGTON DC 20001

KATHLEEN Q ABERNATHY
DAVID A GROSS
ATTORNEY FOR
AIRTOUGH COMMUNICATIONS INC
1818 N STREET NW
WASHINGTON DC 20036

PAMELA J RILEY
ATTORNEY FOR
AIRTOUCH COMMUNICATIONS INC
ONE CALIFORNIA STREET 9TH FLOOR
SAN FRANCISCO CA 94111

DANA FRIX
TAMAR HAVERTY
ATTORNEYS FOR
ACC LONG DISTANCE CORP
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

CAROLYN C HILL
ALLTEL TELEPHONE SERVICES
CORPORATION
655 15TH STREET NW SUITE 220
WASHINGTON DC 20005

MARY NEWMAYER
FEDERAL AFFAIRS ADVISOR
ALABAMA PUBLIC SERVICE COMMISSION
P O BOX 991
MONTGOMERY AL 36101

ROBERT A MAZER
ALBERT SHULDINER
ATTORNEYS FOR
ALIAN T COMMUNICATIONS CO
1455 PENNSYLVANIA AVE NW
WASHINGTON DC 20004-1008

GEORGE VRADENBURG III
WILLIAM W BURRINGTON
JILL A LESSER
AMERICA ONLINE INC
1101 CONNECTICUT AVE NW SUITE 400
WASHINGTON DC 20036

DONNA N LAMPERT
JAMES J VALENTINO
ATTORNEYS FOR
AMERICA ONLINE INC
701 PENNSYLVANIA AVE NW SUITE 900
WASHINGTON DC 20004

COLLEEN BOOTHBY
JAMES BLASZAK
MARY K O CONNELL
ATTORNEYS FOR
AD HOC TELECO USERS COMMITTEE
1300 CONNECTICUT AVE NW SUITE 500
WASHINGTON DC 20036-1703

JOHN ROTHER ESQ
DIRECTOR
AMERICAN ASSOCIATION OF RETIRED
PERSONS
601 E STREET NW
WASHINGTON DC 20049

MARY ROULEAU
LEGISLATIVE DIRECTOR
CONSUMER FEDERATION OF AMERICA
1424 16TH STREET NW SUITE 604
WASHINGTON DC 20036

DR MARK N COOPER
CONSUMERS UNION
1666 CONNECTICUT AVE NW
WASHINGTON DC 20036

DR BARBARA O CONNOR CHAIR
DERALD DEPO PRESIDENT
ALLIANCE FOR PUBLIC TECHNOLOGY
901 15TH STREET NW
WASHINGTON DC 20005

DAVID J NEWBURGER
AMERICAN ASSOCIATION FOR ADULT &
CONTINUING EDUCATION . . . ET AL
ONE METROPOLITAN SQUARE SUITE 2400
ST LOUIS MO 63102

CHARLES H HELEIN
GENERAL COUNSEL
AMERICA'S CARRIERS
TELECOMMUNICATION ASSOCIATION
8180 GREENSBORO DRIVE SUITE 700
MC LEAN VA 22102

CAROL C HENDERSON
EXECUTIVE DIRECTOR DC OFFICE
AMERICAN LIBRARY ASSOCIATION
1301 PENNSYLVANIA AVE NW SUITE 403
WASHINGTON DC 20004

CURTIS T WHITE
MANAGING PARTNER
ALLIED ASSOCIATED PARTNERS LP
ALLIED COMMUNICATIONS GROUP
GELD INFORMATION SYSTEMS
4201 CONNECTICUT AVE NW SUITE 402
WASHINGTON DC 20008-1158

SCOTT L SMITH
VICE PRESIDENT OF
ALASKA TELEPHONE ASSOCIATION
4341 B STREET SUITE 304
ANCHORAGE AK 99503

W FRED SEIGNEUR
PRESIDENT
SERVICES-ORIENTED OPEN NETWORK
TECHNOLOGIES INC
109 KALE AVE
STERLING VA 20164

ROGER HAMILTON CHAIRMAN
RON EACHUS COMMISSIONER
JOAN H SMITH COMMISSIONER
OREGON PUBLIC UTILITY COMMISSION
550 CAPITOL ST NE
SALEM OR 97310-1380

MARK C ROSENBLUM
PETER H JACOBY
JUDY SELLO
AT&T CORPORATION
ROOM 3245I1
295 NORTH MAPLE AVENUE
BASKING RIDGE NJ 07920

GENEVIEVE MORELLI
EXECUTIVE VICE PRESIDENT AND
GENERAL COUNSEL
COMPETITIVE TELECOMMUNICATIONS
ASSOCIATION
1900 M STREET NW SUITE 800
WASHINGTON DC 20036

LEON M KESTENBAUM
JAY C KEITHLEY
H RICHARD JUHNKE
SPRINT CORPORATION
1850 M STREET NW 11TH FLOOR
WASHINGTON DC 20036

BRADLEY STILLMAN
DON SUSSMAN
ALAN BUZACOTT
MCI COMMUNICATIONS CORPORATION
1801 PENNSYLVANIA AVE NW
WASHINGTON DC 20006

MARY MC DERMOTT
LINDA KENT
KEITH TOWNSEND
HANCE HANEY
UNITED STATES TELEPHONE
ASSOCIATION
1401 H STREET NW SUITE 600
WASHINGTON DC 20005

CATHERINE R SLOAN
RICHARD L FRUCHTERMAN III
RICHARD S WHITT
WORLDCOM INC
SUITE 400
1120 CONNECTICUT AVENUE NW
WASHINGTON DC 20036-3902

ROBERT J AAMOTH
JONATHAN E CANIS
ATTORNEYS FOR COMPETITIVE
TELECOMMUNICATIONS ASSOCIATION
SUITE 500
1200 NINETEENTH STREET NW
WASHINGTON DC 20036